

Beth McCullough

From: Steven A. Stadtmauer <Sstadtmauer@HarrisBeach.com>
Sent: Tuesday, December 10, 2013 2:48 PM
To: Kristen Johnson Parker
Cc: Thomas Sobol; mrgottfried@duanemorris.com; Paul Moore (PDMoore@duanemorris.com) (PDMoore@duanemorris.com); HBNECC; Thomas Sobol; Ben Gastel; Frederick H. Fern
Subject: RE: NECC: Recent PSC Proposals
Attachments: HBNYC-#666296-v1-NECC_MDL_Joint_Deposition_Protocol_-_Redline_comparison.pdf; AMERIDOSE - Draft Joint Deposition Protocol.docx

Kristen:

We have shared and discussed the PSC's proposed Deposition Protocol with Mr. Moore. We note that the proposed protocol is significantly different from the draft protocol circulated by counsel for Ameridose after the summer. This draft protocol was shared with the PSC but, to our knowledge, the PSC has not responded. For your reference, we attach the latest Word version available of that proposed protocol as well as a PDF redline comparison with the PSC's most recent proposal.

The Trustee requests that the PSC comment on the earlier proposal, which appears to be practical and comprehensive. Should further discussion be necessary, a meet and confer on the issue should be convened before a protocol is adopted.

Please advise if the PSC has comments to the Ameridose proposal and/or agrees to meet and confer on the issue.

Best regards.

Steven A. Stadtmauer
 Partner

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From: Kristen Johnson Parker [<mailto:kristenjp@hbsslaw.com>]
Sent: Tuesday, December 10, 2013 7:48 AM
To: Frederick H. Fern
Cc: Thomas Sobol; mrgottfried@duanemorris.com; Paul Moore (PDMoore@duanemorris.com) (PDMoore@duanemorris.com); HBNECC; Thomas Sobol; Ben Gastel
Subject: RE: NECC: Recent PSC Proposals

I have not received any comments. When do you expect to send them?

Kristen Johnson Parker | **Hagens Berman Sobol Shapiro LLP** | Direct: (617) 475-1961

From: Jessica Glavan [<mailto:JGlavan@Harrisbeach.com>] **On Behalf Of** Frederick H. Fern
Sent: Monday, December 09, 2013 5:29 PM
To: Kristen Johnson Parker
Cc: Thomas Sobol; mrgottfried@duanemorris.com; Paul Moore (PDMoore@duanemorris.com)
(PDMoore@duanemorris.com); HBNECC
Subject: NECC: Recent PSC Proposals

Dear Kristen:

We have reviewed and discussed with Trustee Moore the Proposed CMO, deposition protocol, ESI and medical release forwarded in your letter of November 27, 2013. Our red-lined comments will be forthcoming.

Frederick H. Fern
Partner

HARRIS BEACH PLLC

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